



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

Mr. Phil Farmer
Premier Boxboard Limited, LLC
P. O. Box 220
Newport, Indiana 47966

January 8, 2004

Re: Minor Source Modification No:
165-18369-00020

Dear Mr. Farmer:

Premier Boxboard Limited, LLC., applied for a Part 70 operating permit on June 10, 2003 for a recycled paperboard mill plant. An application to modify the source was received on November 14, 2003. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for modification at the source:

- (a) One (1) paper machine (identified as PM-1), constructed in 1973, with a maximum throughput rate of 83,333 Bone Dry pounds of paperboard per hour.

The proposed Minor Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). The source may begin operation upon issuance of the source modification approval.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanobar Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
ERG/SD

cc: File - Vermillion County
U.S. EPA, Region V
Vermillion County Health Department
Air Compliance Section Inspector - Jim Thorpe
Compliance Data Section - Karen Ampil
Administrative and Development - Sara Cloe
Technical Support and Modeling - Michele Boner



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www.state.in.us/idem

PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR QUALITY

**Premier Boxboard Limited, LLC
2585 East County Road, 200 North
Cayuga, Indiana 47928**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Minor Source Modification No.: 165-18369-00020	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

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SECTION A

SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the emission units contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary recycled paperboard mill plant.

Responsible Official:	General Manager
Source Address:	2585 East County Road, 200 North, Cayuga, Indiana 47928
Mailing Address:	P.O. Box 220, Newport, Indiana 47966
General Source Phone Number:	(765) 492-3341
SIC Code:	2631
County Location:	Vermillion
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to operate the following emission units and pollution control devices:

- (a) One (1) paper machine (identified as PM-1), constructed in 1973, with a maximum throughput capacity of 83,333 Bone Dry pounds of paperboard per hour. **Note:** The Permittee requested an increase in the maximum throughput of the paper machine (identified as PM-1), from 69,936 to 83,333 Bone Dry pounds of paperboard per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

-
- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
 - (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
 - (c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

-
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) when operation begins, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for the unit.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.8 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

C.9 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.10 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(i) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

C.11 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of

the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.12 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.13 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) paper machine (identified as PM-1), constructed in 1973, with a maximum throughput capacity of 83,333 Bone Dry pounds of paperboard per hour. **Note:** The Permittee requested an increase in the maximum throughput of the paper machine (identified as PM-1), from 69,936 to 83,333 Bone Dry pounds of paperboard per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

There are no specifically applicable regulations that apply to this emission unit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 SOURCE MODIFICATION CERTIFICATION

Source Name: Premier Boxboard Limited, LLC
Source Address: 2585 East County Road, 200 North, Cayuga, Indiana 47928
Mailing Address: P.O. Box 220, Newport, Indiana 47966
Source Modification No.: 165-18369-00020

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:
Printed Name:
Title/Position:
Date:

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Premier Boxboard Limited, LLC
Source Address: 2585 East County Road, 200 North, Cayuga, Indiana 47928
Mailing Address: P.O. Box 220, Newport, Indiana 47966
Source Modification No.: 165-18369-00020

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two **(2)** working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:

Describe the corrective actions/response steps taken:

Describe the measures taken to minimize emissions:

If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Minor Source Modification

Source Background and Description

Source Name:	Premier Boxboard Limited, LLC
Source Location:	2585 East County Road, 200 North, Cayuga, Indiana 47928
County:	Vermillion
SIC Code:	2631
Operation Permit No.:	T165-17809-00020
Operation Permit Issuance Date:	Not issued yet
Minor Source Modification No.:	165-18369-00020
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed a modification application from Premier Boxboard Limited, LLC relating to the modification of the following emission units and pollution control devices:

- (a) One (1) paper machine (identified as PM-1), constructed in 1973, with a maximum throughput capacity of 83,333 Bone Dry pounds of paperboard per hour. **Note:** The Permittee requested an increase in the maximum throughput of the paper machine (identified as PM-1), from 69,936 to 83,333 Bone Dry pounds of paperboard per hour.

History

On November 14, 2003 Premier Boxboard Limited, LLC submitted an application to IDEM, OAQ requesting to modify the existing paper machine (identified as PM-1) by increasing the maximum throughput from 69,936 to 83,333 Bone Dry pounds of paperboard per hour. This modification will not result in de-bottlenecking or increase utilization of other existing emission units. Premier Boxboard Limited, LLC., submitted an application for a Part 70 permit on June 10, 2003 for its existing emission units, which is pending.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 14, 2003.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, page 1 through 3).

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	0.0
SO ₂	0.0
VOC	17.6
CO	0.0
NO _x	0.0

HAPs	Potential To Emit (tons/year)
Methanol	0.65
TOTAL	0.65

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(4)(B)(iii) because the potential to emit of VOC is greater than ten (10) tons per year and less than twenty-five (25) tons per year.

County Attainment Status

The source is located in Vermillion County.

Pollutant	Status
PM10	Maintenance
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment

CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Vermillion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Vermillion County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	0.68
PM10	0.68
SO ₂	0.0
VOC	113
CO	0.0
NOx	0.0

- (a) This existing source is not a major stationary source under PSD because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon potential to emit calculations for the draft Title V.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Emission Units	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
Emission Units Affected by the Modification							
Paper Machine	--	--	--	17.4	--	--	0.65
Net Increase in Emissions due to Modification	--	--	--	17.4	--	--	0.65
PSD Threshold	<250	<250	<250	<250	<250	<250	

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability

- (a) This minor modification does not involve a pollutant-specific emissions unit:
 - (1) With the potential to emit before controls equal to or greater than one hundred (100) tons per year, and
 - (2) That is subject to an emission limit and has a control device that is necessary to meet that limit.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.

- (c) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this modification.
- (d) This modification to an existing source is not subject to the requirements of 40 CFR 63, Subpart JJJJ - National Emissions Standards for Hazardous Air Pollutant (NESHAP): Paper and Other Web Coating (326 IAC 14) because this source does not coat paper, plastic film, or any other web substrate.
- (e) This modification to an existing source is not subject to the requirements of 40 CFR 63, Subpart S - National Emissions Standards for Hazardous Air Pollutant (NESHAP): Pulp & Paper Industry (326 IAC 14) because the source, although processing non-wood fibers, does not consist of a bleaching system as defined in 40 CFR 63.441, Subpart S. Since this source does not perform beaching operations, 40 CFR 63, Subpart S is not applicable. Also, the source does not process kraft, soda, sulfide or semi-chemical pulping of wood fibers.

There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this modification.

- (d) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because this modification does not result in a potential to emit equal to or greater than ten (10) tons per year of any single HAP and combination of HAPs, respectively, and also the source does not include one or more units that belong to

one or more source categories affected by the Section 112(j) MACT Hammer date of May 15, 2002.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source was constructed in 1973 and is not in one (1) of the twenty-eight (28) source categories. At construction, the source had a potential to emit of each criteria pollutant before control less than two hundred and fifty (250) tons per year. The source was modified in 1989 to construct and operate a high density stock chest unit (identified as HDSC) and will be modified after the issuance of this modification to increase the maximum throughput of the paper machine (identified as PM-1) from 69,936 to 83,333 Bone Dry pounds of paperboard per hour. After these modifications, the potential to emit of each criteria pollutant remains below 250 tons per year. Therefore, this source is an existing minor source under PSD and the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-4.1 (Major Source of Hazardous Air Pollutants (HAPs))

The one (1) paper machine (identified as PM-1) is not subject to the requirements of 326 IAC 2-4.1 because this emission unit was built prior to July 27, 1997, the applicability date for this rule.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because the potential to emit of VOC from this modification is less than one hundred (100) tons per year and it is located in Vermillion county. Once the Title V permit is issued, the source will become subject to this rule and comply with the requirements of 326 IAC 2-6 (Emission Reporting).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Paper Machine

326 IAC 8-1-6 (New Facilities - General Reduction Requirement)

The paper machine (identified as PM-1) was constructed before January 1, 1980, the applicability date for this rule. Therefore, this emission unit is not subject to the provisions of 326 IAC 8-1-6.

326 IAC 8-2-5 (Paper Coating Operation)

The paper machine (identified as PM-1) is not subject to 326 IAC 8-2-5 (Paper Coating Operation) because this unit is not engaged in web coating or paper saturation processes.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This modification to an existing source is not subject to the requirements of 326 IAC 8-6 (Organic Solvent Emission Limitations) because the source commenced operation prior to October 7, 1974, the applicability date for this rule as described in 326 IAC 8-6-1(2) and is located in Vermillion county.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring requirements applicable to this modification.

Conclusion

This proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 165-18369-00020.

Appendix A: Emission Calculations
VOC Emissions
From One (1) Paper Machine

Company Name: Premier Boxboard Limited, LLC

Address: 2585 East County Road 200 North, Cayuga, Indiana 47928

MSM to Title V (not yet): 165-18369

Pit ID: 165-00020

Reviewer: ERG/SD

Date: December 11, 2003

Emission Unit	Max Throughput Rate of Bone Dry (lbs/hour)	Rate of Bone Dry ** (BDTP/day)	* Emission Factor VOC (lbs/BDTP)	Potential To Emit VOC (tons/year)
One (1) Paper Machine with Current Usage	69936	839	0.6	91.9
One (1) Paper Machine with Increased Usage	83333	1000	0.60	110
Net Increase in Emissions				17.6

TOTAL

* Emission factor is based on a stack testing performed at the source on March 31, 1999.

** BDTP = Bone dry in tons of paperboard

METHODOLOGY

Max. Throughput of Bone Dry (BDTP/day) = Max. Throughput Rate of Bone Dry (lbs/hour) * 24 hours/day * 1 ton/2000 lbs

PTE of VOC (tons/year) = Max. Throughput Rate of Bone Dry (lbs/hour) * 24 hours/day * 1 ton/2000 lbs * Emission Factor (lb/BDTP) * 365 days/year * 1 ton/2000 lbs

Appendix A: Emission Calculations
HAP Emissions
From One (1) Paper Machine

Company Name: Premier Boxboard Limited, LLC
Address: 2585 East County Road 200 North, Cayuga, Indiana 47928
MSM to Title V (not yet): 165-18369
Pit ID: 165-00020
Reviewer: ERG/SD
Date: December 11, 2003

Emission Unit	Max Throughput Rate of Bone Dry (lbs/hour)	Rate of Bone Dry ** (BDTP/day)	Emission Factor Methanol (lb/BDTP)	Potential To Emit Methanol (tons/year)
One (1) Paper Machine with Current Usage	69936	839	0.022	3.37
One (1) Paper Machine with Increased Usage	83333	1000	0.022	4.02
Net Increase in Emissions				0.65

* Emission factor is based on a study conducted by the National Council of the Paper Industry for Air and Stream Improvement (NCASI), TB740, Table 6-9 (1997).

** BDTP = Bone dry in tons of paperboard

METHODOLOGY

Max. Throughput of Bone Dry (BDTP/day) = Max. Throughput Rate of Bone Dry (lbs/hour) * 24 hours/day * 1 ton/2000 lbs

PTE of VOC (tons/year) = Max. Throughput Rate of Bone Dry (lbs/hour) * 24 hours/day * 1 ton/2000 lbs * Emission Factor (lb/BDTP) * 365 days/year * 1 ton/2000 lbs

Appendix A: Emission Calculations
Summary Emissions

Company Name: Premier Boxboard Limited, LLC
Address: 2585 East County Road 200 North, Cayuga, Indiana 47928
MSM to Title V (not yet): 165-18369
Plt ID: 165-00020
Reviewer: ERG/SD
Date: December 11, 2003

POTENTIAL TO EMIT IN TONS PER YEAR

Emission Units	PM	PM10	SO ₂	NOx	VOC	CO	* Single Highest HAP
Paper Machine					17.6		0.65

* Methanol